

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE BP SHAREHOLDER DERIVATIVE
LITIGATION

)
) MDL NO. 2185
)
)

) Case No. 4:10-cv-03447
)
)

In Re: BP P.L.C. SECURITIES
LITIGATION

) Civil Action No. 4:10-md-2185
)
)

) HON. KEITH P. ELLISON
)
)

DEFENDANTS' UNOPPOSED MOTION TO ENTER FINAL JUDGMENT

OF COUNSEL:

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BP p.l.c. and Defendants Iain C. Conn, Robert
W. Dudley, Byron E. Grote, Anthony B.
Hayward, Andy G. Inglis, Antony Burgmans,
Cynthia B. Carroll, William M. Castell,
George David, Erroll B. Davis, Jr., Douglas J.
Flint, DeAnne S. Julius, Ian M.G. Prosser,
Peter Sutherland, Carl-Henric Svanberg,
H. Lamar McKay, and Robert A. Malone*

Defendants file this Unopposed Motion to Enter Final Judgment pursuant to Federal Rule of Civil Procedure 58, and would show as follows:

1. On September 15, 2011, the Court issued a memorandum and order dismissing this case on *forum non conveniens* grounds (Order of Dismissal, Doc. No. 131). This Court conditioned the dismissal on Defendants' stipulation that they will submit to the jurisdiction of the appropriate English court.

2. On October 3, 2011, individual Defendants filed a Stipulation (Doc. No. 132), agreeing to "submit to the jurisdiction of the appropriate English court in any derivative action brought by a shareholder of BP p.l.c. in that court based upon the facts and claims alleged in the Verified Consolidated Amended Shareholder Derivative Complaint in this action."

3. On October 12, 2011, Plaintiffs filed an Opposed Motion to Alter or Amend the Court's Order Dated September 15, 2011 (Doc. No. 133).

4. On November 23, 2011, the Court issued a memorandum and order denying Plaintiffs' Motion to Alter or Amend the Court's Order Dated September 15, 2011 (Doc. No. 136).

5. Plaintiffs do not oppose entry of final judgment in the proposed form attached to this motion.

6. Therefore, pursuant to Federal Rule of Civil Procedure 58, Defendants respectfully request the Court order the Court Clerk to enter a final judgment in the proposed form attached to this motion.

WHEREFORE PREMISES CONSIDERED, Defendants respectfully request that Defendants' Unopposed Motion to Enter Final Judgment be granted.

Dated: December 8, 2011

Respectfully submitted,

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Lamar McKay, and Robert A. Malone*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendants' Unopposed Motion To Enter Final Judgment has been served by electronic CM/ECF filing, on this 8th day of December, 2011.

s/Thomas W. Taylor

Thomas W. Taylor